



Silver & Mercury Code of Management Practice Program

Compliance Plan

Facility Name:

Location Address: _____

Mailing Address: _____
(If different from above)

City, State Zip: _____

Contact Name:

Phone Number: _____ Fax Number: _____

E-mail:

Silver Dischargers:

Implementation of the CMP will require treatment of the used fixer from photo development or x-ray diagnostic activities either on-site silver recovery or dispose of silver fixer solution off site.

I plan to manage the silver laden solution generated at my facility by doing the following.
Please indicate by checking the option below:

☐ *Maintain On-Site Silver Recovery*

Requirements:

- Conduct quarterly tests on solution entering the treatment unit (influent) and leaving the treatment unit (effluent) using silver test strips. Results are to be recorded in a log book and kept on-site.
- Maintain Operation and Maintenance records of the Treatment Unit.
- Once per year collect samples on influent and effluent of treatment unit and send to a KDHE certified laboratory for analyses. Compliance with the CMP is verified with the City by calculating the percent silver recovery amounts of the Unit.
- Once per year on January 30 following the preceding report year, a Self Monitoring Report shall be submitted to the City. The certified analyses shall be included in the report.

☐ *Off-Site Silver Laden Waste Disposal*

Requirements:

- Maintain record verifying the amount of solution that was transported off site for recovery. Must maintain manifests and hauler receipts. The generator can transport the material to the Household Hazardous Waste Site for disposal at the City operated silver recovery unit. The City will only accept the fixer for disposal purposes. The container with the material must be clearly marked: SILVER FOR RECOVERY
- Once per year on January 30 following the preceding report year, a Self-Monitoring Report (SMR) shall be submitted to the City. The SMR no-discharge statement must be signed. Analytical data **will not** be required.

Mercury Dischargers - Dental Mercury/Silver Amalgam Restorations

Implementation of the CMP will require cleaning chairside traps regularly and if still using mercury silver amalgam for restorations switching to precapsulated amalgam.

- Never rinse amalgam traps over the drain or discard as biohazards or in the garbage.
- Collect amalgam scrap in a designated airtight container. Label Container: MERCURY AMALGAM FOR RECOVERY
- Maintain log of the amount of material generated and disposed of
- Clean or Replace Central Vacuum Filters regularly

If your facility plans to utilize Separator technology, please indicate below:

This may be a requirement in the future. The City is currently evaluating the effectiveness of these units and will announce later if using separator technology will be a requirement for CMP compliance.

___ _ I am currently using Separator technology

___ _ I plan to implement Separator technology by ___ _
(date)

___ _ Unless indicated by the City it is necessary, I am not planning to implement Separator technology.

Signature

date

Print Name